

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (CA Bar No. 226112)
 Jeffrey M. Rosenfeld (CA Bar No. 222187)
 Virginia A. Sanderson (CA Bar No. 240241)
 150 Post Street, Suite 520
 San Francisco, CA 94108
 Telephone: (415) 955-1155
 Facsimile: (415) 955-1158
 karl@KRInternetLaw.com
 jeff@KRInternetLaw.com
 ginny@KRInternetLaw.com

Attorneys for Plaintiffs
 AMBER KRISTI MARSH AND STACIE EVANS

**DENNIS A. WINSTON A PROFESSIONAL
LAW CORPORATION**

Dennis A. Winston (CA Bar No. 068049)
 3221 Carter Ave, Apt. 444
 Marina Del Rey, California 90292
 Telephone: (310) 306-4099
 Facsimile: (310) 306-4499
 denniswinston@yahoo.com

Attorneys for Defendants
 ZAAZOOM SOLUTIONS, LLC; ZAZA PAY, LLC;
 AUTOMATED ELECTRONIC CHECKING, INC.;
 MULTIECOM, LLC; AND
 ONLINE RESOURCE CENTER, LLC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

AMBER KRISTI MARSH and
STACIE EVANS, individually and on
 behalf of a class of similarly situated
 persons,

Plaintiffs,

vs.

ZAAZOOM SOLUTIONS, LLC, *et al.*,

Defendants.

CLASS ACTION

Case No. 3:11-cv-05226-RS

STIPULATION AND ~~PROPOSED~~
 ORDER TO SET ASIDE DEFAULT
 ENTERED AGAINST DEFENDANTS
 MULTIECOM, LLC AND ONLINE
 RESOURCE CENTER, LLC

[F.R.Civ.P. 55(c)]

TO THE CLERK OF THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiffs AMBER KRISTI MARSH and STACIE EVANS ("Plaintiffs") and Defendants MULTIECOM, LLC and ONLINE RESOURCE CENTER, LLC ("Defendants") hereby STIPULATE as follows:

1. On November 15, 2011, the Clerk of the Court entered default against Defendants MultiECom, LLC and Online Resource Center, LLC [D.E. No. 26] (the "Default").

2. The Default was the result of mistake, inadvertence and excusable neglect on the part of counsel for Defendants which were first named as Defendants in the Second Amended Complaint in the above-captioned action.

2. Plaintiffs will not be prejudiced by setting aside the Default and the Default was not the result of bad faith.

3. Plaintiffs and Defendants therefore stipulate and request that the Court set aside the Default pursuant to Federal Rule of Civil Procedure 55(c).

IT IS SO STIPULATED.

DATED: November 18, 2011

DATED: November 18, 2011

KRONENBERGER ROSENFELD, LLP

DENNIS A. WINSTON A PROFESSIONAL LAW CORPORATION

By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

By: s/ Dennis A. Winston
Dennis A. Winston

Attorneys for Plaintiffs

Attorney for Defendants Zaazoom Solutions, LLC; Zaza Pay LLC, Automated Electronic Checking, Inc, Multiecom, LLC and Online Resource Center, LLC

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that pursuant to Federal Rule of Civil Procedure 55(c), the defaults entered against Defendants Multiecom, LLC and Online Resource Center, LLC, [D.E. No. 26], are hereby set aside.

IT IS HEREBY FURTHER ORDERED that Defendants Multiecom, LLC and Online Resource Center, LLC shall file a responsive pleading or motion within five (5) days of this Order.

Dated: November 18, 2011



THE HON. RICHARD SEEBORG
United States District Court Judge

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to the General Order No. 45, section 45 X(B), for The United States District Court for the Northern District of California, I, Jeffrey M. Rosenfeld, hereby attest that the concurrence to the filing of the foregoing stipulation has been obtained from Dennis A. Winston who has provided the conformed signature above.